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15 IN THE UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

17
18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21
22 VICTOR MANUEL ALVAREZ,

23
24 Defendants.

25 CASE NO. 1:25-CR-00054-KES-BAM

26 STIPULATION REGARDING EXCLUDABLE
27 TIME PERIODS UNDER SPEEDY TRIAL ACT;
28 AND ORDER

29
30 STIPULATION

31 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
32 through her counsel of record, hereby stipulate as follows:

33 1. By previous order, this matter was set for a status conference on June 11, 2025.

34 2. By this stipulation, defendant now moves to continue the status conference to October 8,
35 2025, and to exclude time between June 11, 2025, and October 8, 2025, pursuant to 18 U.S.C. §
36 3161(h)(7)(A), B(iv).

37 3. The parties agree and stipulate, and request that the Court find the following:

38 a) The government provided initial discovery to the defense. The discovery
39 generally consisted of law enforcement reports, photos, and undercover reports and recordings.

40 b) Defense counsel is continuing to investigate the case. Defense counsel requests

1 additional time to conduct his own independent investigation.

2 c) The parties require additional time to engage in plea negotiations.

3 d) The defendant asks the Court to exclude time between June 11, 2025, and October
4 8, 2025, to account for time to discuss the plea with the Government and defendant, to conduct
5 his own investigation, taking into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendants in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of June 11, 2025 to October 8, 2025,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results
13 from a continuance granted by the Court at defendants' request on the basis of the Court's
14 finding that the ends of justice served by taking such action outweigh the best interest of the
15 public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

19 IT IS SO STIPULATED.

20 Dated: June 9, 2025

21 MICHELE BECKWITH
Acting United States Attorney

22 /s/ ARIN C. HEINZ
23 ARIN C. HEINZ
24 Assistant United States Attorney

25 Dated: June 9, 2025

26 /s/ DAVID TORRES
27 DAVID TORRES
28 Counsel for Defendant

ORDER

IT IS SO ORDERED that the status conference is continued from June 11, 2025 to **October 8, 2025 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: June 9, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE